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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 DESHANN HINES
aka "Deshawn Hines,"

13 Defendant.

14 Case No. 2:25-cr-00004-JCM-BNW

15 **STIPULATION FOR A PROTECTIVE
16 ORDER**

17 The parties, by and through the undersigned, respectfully request that the Court issue
18 an order protecting from disclosure to the public, or any third party not directly related to this
case, discovery produced by the government, specifically cellphone extraction data for co-
defendant Knowledge Rodriguez, that contains confidential non-public information. The
parties state as follows:

20 1. The discovery produced in connection with this case contains confidential
21 non-public information, including information of third parties.

22 2. In order to protect the privacy of the individuals referenced in the discovery,
23 the parties intend to restrict access to the following individuals: attorneys for all parties, the
24 Defendant, and any personnel that the attorneys for all parties consider necessary to assist in

1 performing that attorney's duties in the prosecution or defense of this case, including
2 investigators, paralegals, retained experts, support staff, interpreters, and any other
3 individuals specially authorized by the Court (collectively, the "Covered Individuals").

4 3. The Covered Individuals shall be advised of the Protective Order, and, without
5 leave of Court, the Covered Individuals shall not:

6 a. make copies for, or allow copies of any kind to be made by any other
7 person of the Protected Information in this case;

8 b. unless otherwise provided in this agreement, allow any other person to
9 read, listen, or otherwise review the Protected Information in this case;

10 c. use the Protected Information for any purpose other than preparing to
11 defend against the charges in this case; or

12 d. attach any Protected Information to any of the pleading, briefs, or other
13 court filings except to the extent those pleadings, briefs, or filings are filed under seal or
14 properly compliant with LR IC 6-1. The restrictions placed in subsection 3(a) – (d) do not
15 restrict or prevent the Defendant from using, for the purpose of investigation, the Protected
16 Information identified in this Order. However, no person shall be permitted to copy, record,
17 or duplicate the materials used during the investigation. Additionally, any
18 investigator/covered persons shall undertake all reasonable efforts to ensure that non-
19 covered persons do not copy or record the protected information during the course of the
20 investigation.

21 4. Nothing in this stipulation is intended to restrict the parties' use or
22 introduction of the Protected Material as evidence at trial or support in motion practice.

23 5. The parties shall inform any person to whom disclosure may be made
24 pursuant to this order of the existence and terms of this Court's order. The parties reserve the

right to seek to modify the terms of this protective order at a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need for this protective order cease to exist, on grounds other than a Covered Individual or some other person violating or circumventing its terms, the Government will move expeditiously for its dissolution.

6. In the event of an inadvertent disclosure of the Protected Information, the party making or learning of the inadvertent disclosure will immediately:

a. Notify the person to whom the disclosure was made that it contains Protected Information subject to a Protective Order;

b. Make all reasonable efforts to preclude dissemination or use of the

c. Notify the Government and other parties of the identity of the person to whom the disclosure was made, the circumstances surround the disclosure, and the steps taken to ensure against further dissemination or the use of the information; and

d. Notify the Court in writing under seal.

7. The defense hereby stipulates to this protective order.

DATED: May 21, 2025

Respectfully submitted,

SIGAL CHATTAH
United States Attorney

/s/ Lauren M. Ibanez
Lauren M. Ibanez
Assistant United States Attorney

/s/ Austin Barnum
Austin Barnum
Counsel for Defendant

1 All motions to seal must comply with Local Rule IA 10-5 and *Kamakana v. City*
2 & Cnty. of Honolulu

3 **IT IS SO ORDERED.**

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6 HONORABLE BRENDA N. WEKSLER
7 UNITED STATES MAGISTRATE JUDGE

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10 May 23, 2025
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12 DATE

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